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*Attorneys for Defendant and
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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,
Plaintiff,
v
SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and
DOES NOS. 1-50,
Defendants.
SKYRYSE, INC.,
Counterclaimant,
v
MOOG INC.,
Counterclaim-Defendant.

CASE NO. 2:22-cv-09094-GW-MAR

**DEFENDANT-COUNTERCLAIMANT
SKYRYSE, INC.'S APPLICATION
FOR LEAVE TO LODGE UNDER
SEAL CERTAIN PORTIONS OF
DEFENDANT-COUNTERCLAIMANT
SKYRYSE'S SUPPLEMENTAL
MEMORANDUM IN SUPPORT OF
MOTION TO ENFORCE ORDER
COMPELLING TSID**

Hon. Margo A. Rocconi

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Local Rule 79-5.2.2(b), Defendant and Counterclaimant Skyryse, Inc. (“Skyryse”) hereby applies for an order permitting the following documents filed in connection with Skyryse’s Supplemental Memorandum in Support of Motion to Enforce Order Compelling TSID (“Supplemental Memorandum”) to be lodged under seal with the Court.

Document	Designating Party	Text to be Filed/Lodged under Seal
Defendant-Counterclaimant Skyryse, Inc.’s Supplemental Memorandum in Support of Motion to Enforce Order Compelling TSID	Moog	Highlighted portions in the unredacted version at page: 3

As the Filing Party, Skyryse has provisionally lodged under seal certain portions of the Supplemental Memorandum that Plaintiff and Counterclaim-Defendant Moog, Inc. has designated as Protected Material under the Protective Order entered in this action, dated May 6, 2022 (Dkt. 89), or that Moog has otherwise requested to be sealed. Accordingly, pursuant to paragraph 12.1 of the Protective Order, Skyryse seeks to provisionally lodge these materials under seal until such time as Moog withdraws its confidentiality designations or the Court rules on a forthcoming application from Moog to justify that these documents, or portions of thereof, remain under seal. Skyryse reserves all rights under the Protective Order to challenge Moog’s designations of the identified materials as Protected Material.

This application is further based upon the accompanying Declaration of Kelley Storey in Support of this Application; any pleadings, files, and records in this action; and any further evidence or argument as this Court may consider.

On May 23, 2023, counsel for Skyrise conferred via email with counsel for Moog regarding the supplemental memorandum. On May 23, 2023, counsel for Moog confirmed that certain portions of the supplemental memorandum should be provisionally lodged under seal, as they involve references to sensitive government programs.

Dated: May 24, 2023

Respectfully submitted,

LATHAM & WATKINS LLP

By: /s/ Gabriel S. Gross

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